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8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 VANESSA LIBRERA,

11 Plaintiff,

12 vs.

13 ALBERTSON'S, LLC d/b/a
14 ALBERTSON'S; ALBERTSON'S STORES
15 SUB LLC; ABS NV-O LLC; DOES 1
16 through 100 and ROE CORPORATIONS 1
17 through 100, inclusive,

18 Defendants.

Case No.: 2:18-cv-00873-JCM-CWH

19 **STIPULATION AND ORDER TO
EXTEND TIME FOR PLAINTIFF TO
RESPOND TO DEFENDANTS'
MOTIONS IN LIMINE (FIRST
REQUEST)**

20 IT IS HEREBY STIPULATED by and between Plaintiff VANESSA LIBRERA
21 ("Plaintiff"), by and through her counsel of record, FARHAN R. NAQVI and ELIZABETH E.
22 COATS of NAQVI INJURY LAW, and Defendants ALBERTSON'S LLC d/b/a
23 ALBERTSON'S, ALBERTSON'S STORES SUB LLC and ABS NV-O LLC STATE FARM,
24 by and through their counsel of record, JACK P. BURDEN, ESQ. of BACKUS, CARRANZA &
25 BURDEN, that Plaintiff be granted an extension of time in which to file responsive pleadings to
26 Defendants' motions in limine filed on July 16, 2020, which include the following:

- 27 1. *Defendants' Motion in Limine No. 1.: To Exclude Sedgwick Claims Management*
28 *Pre-Litigation Claims File [ECF Doc. 47]*



- 1 2. *Defendants' Motion in Limine No. 2: To Exclude Evidence of all Prior Incidents,*
2 *Reports, Lawsuits or Claims [ECF Doc. 48]*
- 3 3. *Defendants' Motion in Limine No. 3: To Exclude Articles on Safety, Preventable*
4 *Deaths, and Cart Corral Maintenance [ECF Doc. 49]*
- 5 4. *Defendants' Motion in Limine No. 4: To Exclude Any Testimony, Evidence or*
6 *Questioning Regarding the Installation and Inspection of the Cart Corral [ECF*
7 *Doc. 50]*
- 8 5. *Defendants' Motion in Limine No. 5: To Exclude Testimony, Evidence Regarding*
9 *Unavailability of any Witnesses [ECF Doc. 51]*
- 10 6. *Defendants' Motion in Limine No. 6: To Exclude Plaintiff from Presenting*
11 *Arguments Based Upon Reptilian Theory, the Golden Rule or Safety Rules [ECF*
12 *Doc. 52]*

13 The parties stipulate that the deadline for Plaintiff's responsive pleadings to the
14 aforementioned motions be up to and including August 14, 2020. This is the first stipulation for
15 extension of time to file Plaintiff's responsive pleadings to the subject motions. The trial in this
16 matter is currently set for January 25, 2021.

17 DATED this 21st day of July, 2020.

18 NAQVI INJURY LAW

19 _____
20 /s/ Elizabeth E. Coats

21 FARHAN R. NAQVI
22 Nevada Bar No. 8589
23 ELIZABETH E. COATS
24 Nevada Bar No. 12350
25 9500 W. Flamingo Rd., Suite 104
26 Las Vegas, Nevada 89147
27 Counsel for Plaintiff

28 DATED this 21st day of July, 2020.

1 BACKUS, CARRAZNA & BURDEN

2 _____
3 /s/ Jack P. Burden

4 JACK P. BURDEN, ESQ.
5 Nevada Bar No. 6918
6 3050 South Durango Drive
7 Las Vegas, Nevada 89117
8 Counsel for Defendants

9 **IT IS SO ORDERED:**

10 _____
11 Xenia C. Mahan
12 _____
13 UNITED STATES DISTRICT JUDGE

14 _____
15 DATED: July 27, 2020